## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF IOWA CENTRAL DIVISION

PELLA CORPORATION,	
Plaintiff,	Law No. 4:11-cv-00273
vs.  LIBERTY MUTUAL INSURANCE COMPANY,	MOTION FOR ADMISSION PRO HAC VICE
Defendant.	

Danielle Perez, a lawyer who is not a member of the bar of this district, moves to appear in this case pro hac vice on behalf of Defendant, Liberty Mutual Insurance Company. Danielle Perez states that she is a member in good standing of the bar of the highest court of the state of Michigan, and that she agrees to submit to and comply with all of the provisions and requirements of the rules of conduct applicable to lawyers admitted to practice before the state courts of Iowa in connection with his pro hac vice representation in this case.

Danielle Perez further states she will comply with the associate counsel requirements of LR 83.2.d.4 by associating with Robert V.P. Waterman, Jr., a lawyer who has been admitted to the bar of this district under LR 83.2.b and c and who has entered an appearance in this case on behalf of Liberty Mutual Insurance Company.

Danielle Perez states she can be contacted at the following locations:

Plunkett Cooney, 38505 Woodward Avenue, Suite 2000, Bloomfield Hills, MI, 48304; (248)
901-4000; facsimile: (248) 901-4040; e-mail: dperez@plunkettcooney.com.

## Respectfully submitted,

/s/ Danielle Perez

Danielle Perez PLUNKETT COONEY 38505 Woodward Avenue, Suite 2000 Bloomfield Hills, MI 48304

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Date: June 29, 2011

I hereby certify that on this 29 day of June, 2011, I electronically filed the foregoing **Motion for Admission Pro Hac Vice** with the Clerk of Court using the ECF system, which will send notification of such filing to the following:

Richard W. Lozier, Jr. Mark E. Weinhardt BELIN McCORMICK, P.C. 666 Walnut Street, Suite 2000 Des Moines, IA 50309 Telephone: (515) 283-4636

Telephone: (515) 283-4636 Facsimile: (515) 558-0636

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\_/s/ Robert V.P. Waterman, Jr.